

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

ISABEL TERESA FERNANDEZ JENKINS, as :
Next of kin of MYKEL D. JENKINS (Deceased), :
 :
Plaintiff, :
 :
vs. : Civil Action No. 1:22-cv-69
 :
CITY OF CHATTANOOGA, CHATTANOOGA :
POLICE DEPARTMENT, JOHN DOE 1, JOHN :
DOE 2, JOHN DOE 3, and JOHN DOE 4, in their :
Official capacities as agents for the Chattanooga :
Police Department, :
 :
Defendants. :

DEFENDANT, CITY OF CHATTANOOGA'S INITIAL RULE 26 DISCLOSURES

Comes now the City of Chattanooga pursuant to *Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure* and the Order of this Court entered at *Doc. 6* in this case and files the following initial disclosures and its list of potential witnesses with discoverable information in connection with this matter as follows:

(i) The name and, if known, the address and telephone number of each individual likely to have discoverable information--along with the subjects of that information--that the Defendants may use to support their claims or defenses:

1. Deputy Chief Eric Tucker
c/o Chattanooga Police Department (CPD policies and procedures,
3410 Amnicola Highway training, and internal investigations)
Chattanooga, Tennessee 37406
(423) 643-5000
2. Captain Nathan Vaughn and/or other accreditation employee
c/o Chattanooga Police Department (CPD policies and procedures,
3410 Amnicola Highway training, and internal investigations)
Chattanooga, Tennessee 37406
(423) 643-5000

3. Assistant Chief Glen Scruggs
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(CPD policies and procedures,
training, and internal investigations)
4. Lieutenant Toby Hewitt and/or other Internal Affairs officer
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(IA investigation 2020-076
and other IA files of Defendants)
5. Lieutenant Anthony Easter and/or other CPD training official
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(CPD policies and procedures,
training, and internal investigations)
6. Captain Scott Fulgham
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
7. Sergeant Jason Wood
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
8. Sergeant Kevin Willoughby
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
9. Lieutenant Heather Williams
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)

10. Officer Alex Roebuck
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
11. Officer Andrew Peker
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
12. Officer Barry Vrandenburgh
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
13. Officer Benny Condra
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
14. Officer Blake Martin
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
15. Officer Brian Blumenberg
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
16. Officer Brian Smith
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)

17. Officer James Miller
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
18. Officer Jason Maucere
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
19. Officer Jeremy Eames
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
20. Officer Jessica Buys
c/o Chattanooga Police Department
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Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
21. Officer Jonah Odenthal
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
22. Officer Lee Mayweather
c/o Chattanooga Police Department
3410 Amnicola Highway
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(423) 643-5000
(Facts relating to incident at issue)
23. Officer Lucas Timmons
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)

24. Officer Marc Stockman
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
25. Officer Michael Thompson
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
26. Officer Paull Slater
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
27. Officer Rebekah Schwarts
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
28. Officer Richard Patterson
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
29. Officer Ricky Ballard
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)
30. Officer Robin Langford
c/o Chattanooga Police Department
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
(Facts relating to incident at issue)

31. Officer Steven Givens
c/o Chattanooga Police Department (Facts relating to incident at issue)
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
32. Officer Victor Miller
c/o Chattanooga Police Department (Facts relating to incident at issue)
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
33. Officer William Epling
c/o Chattanooga Police Department (Facts relating to incident at issue)
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
34. Officer Casey Cleveland
c/o Chattanooga Police Department (Facts relating to incident at issue)
3410 Amnicola Highway
Chattanooga, Tennessee 37406
(423) 643-5000
35. Any witnesses listed by Plaintiff or discovered with relevant facts during this litigation.
36. Any necessary rebuttal witnesses.

(ii) A description by category and location of all documents, electronically stored information, and tangible things these Defendants have in their possession, custody, or control and may use to support their claims or defenses:

1. Chattanooga Police Department (“CPD”) Internal Affairs files;
2. Any documents obtained in discovery;
3. MP4 Body Cam Video 2021-03-19 1021;
4. MP4 Body Cam Video 2021-03-19 771;
5. MP4 Body Cam Video 2021-03-19 1013;
6. MP4 Body Cam Video 2021-03-19 271;

7. IA 2021-039 - OIA Report of Investigation;
8. Incident Report 21-027163;
9. In-Service Firearm Records for Officers Blumberg and Martin;
10. Chattanooga Police Department Firearm Discharge – OIS Report;
11. MP4 of Call to Dispatch;
12. (CAD card) CPD 21-027163;
13. All exhibits listed by any other party; and
14. Any necessary exhibits for rebuttal.

(iii) A computation of each category of damages claimed by the disclosing party, who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered:

Not applicable.

(iv) Any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment:

The City does not have any insurance agreements under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Respectfully submitted,

CITY OF CHATTANOOGA, TENNESSEE
OFFICE OF THE CITY ATTORNEY

By: s/ Phillip A. Noblett

PHILLIP A. NOBLETT – BPR #10074

Deputy City Attorney

KATHRYN C. MCDONALD – BPR #30950

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Assistant City Attorneys

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(423) 643-8255 - Fax

Attorneys for Defendant, City of Chattanooga

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

Robert Davis
DAVIS, KESSLER & DAVIS
433 Cherokee Boulevard
Chattanooga, TN 37405

This 1st day of July, 2022.

s/ Phillip A. Noblett
PHILLIP A. NOBLETT

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